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7 Attorneys for *Specially Appearing Defendants*
8 PROPELR MUSIC, LLC; MARIANI, INC.;
ANTOINE REED p/k/a “Sir Michael Rocks”;
and Defendant 10Q LLC

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 TAYLOR D. PENDLETON, an
individual,

13 Plaintiff,

14 v.

15 10Q LLC, a California Limited Liability
Company; PROPELR MUSIC, LLC, an
Illinois Limited Liability Company;
MARIANI, INC., an Illinois
corporation; ANTOINE REED p/k/a “Sir
Michael Rocks,” an individual; and DOES
1 through 100, inclusive,

16 Defendants.

17 Case No. 2:22-cv-04806-RGK-PVC

18 Judge: Hon. R. Gary Klausner

19 **SPECIALLY APPEARING
DEFENDANTS PROPELR MUSIC,
LLC, MARIANI, INC. AND
ANTOINE REED’S NOTICE OF
MOTION AND MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION
PURSUANT TO FED R. CIV. P.
12(b)(2)**

20 Filed concurrently herewith:

21 (1) Memorandum of Points &
Authorities
22 (2) Declaration of Eduardo Martorell
23 (3) Declaration of Antoine Reed
24 (4) Declaration of Josh Kaplan
25 (5) Request for Judicial Notice
26 (6) [Proposed] Order

27 Hearing Date: January 23, 2023
Time: 9:00 a.m.

28 Action filed: July 13, 2022

1 **NOTICE OF MOTION AND MOTION TO DISMISS UNDER RULE 12(b)(2)**

2 Please take notice that on January 23, 2023, at 9:00 a.m., or as soon thereafter
 3 as the matter parties may be heard, in the Courtroom of Honorable R. Gary Klausner,
 4 Courtroom 850 on the 8th Floor of the Roybal Federal Building and U.S. Courthouse,
 5 located at 255 East Temple Street., Los Angeles, CA 90012. *Specially Appearing*
 6 Defendants PROPELR MUSIC, LLC (“PROPELR”), an Illinois Limited Liability
 7 Company; MARRIANI, INC. (“MARRIANI”), an Illinois corporation; ANTOINE
 8 REED p/k/a “Sir Michael Rocks,” (“REED”) an individual residing in Illinois
 9 (collectively, the “Illinois Defendants”), hereby make this *special appearance*,
 10 requesting this Court to dismiss Plaintiff Taylor D. Pendleton’s (“Plaintiff”)
 11 Complaint against the Illinois Defendants for lack of personal jurisdiction.

12 This motion is based upon the accompanying Memorandum of Points and
 13 Authorities, the Request for Judicial Notice, the declarations submitted therewith, all
 14 documents in the Court’s file, and such other written and oral arguments and
 15 evidence as may be presented to the Court. This Motion is also made following the
 16 telephonic conference of counsel for parties pursuant to Local Rule 7-3, which took
 17 place on December 16, 2022. (*See* Declaration of Eduardo Martorell (“Martorell
 18 Decl.”), ¶¶ 2-5.)

19
 20 Dated: December 23, 2022

MARTORELL LAW APC

21
 22 By: /s/ Eduardo Martorell

Eduardo Martorell

Jordan M. Zim

23
 24 Attorneys for *Specially Appearing*
 25 Defendants PROPELR MUSIC, LLC;
 26 MARRIANI, INC.; ANTOINE REED p/k/a
 27 “Sir Michael Rocks”; and Defendant
 28 10Q LLC